

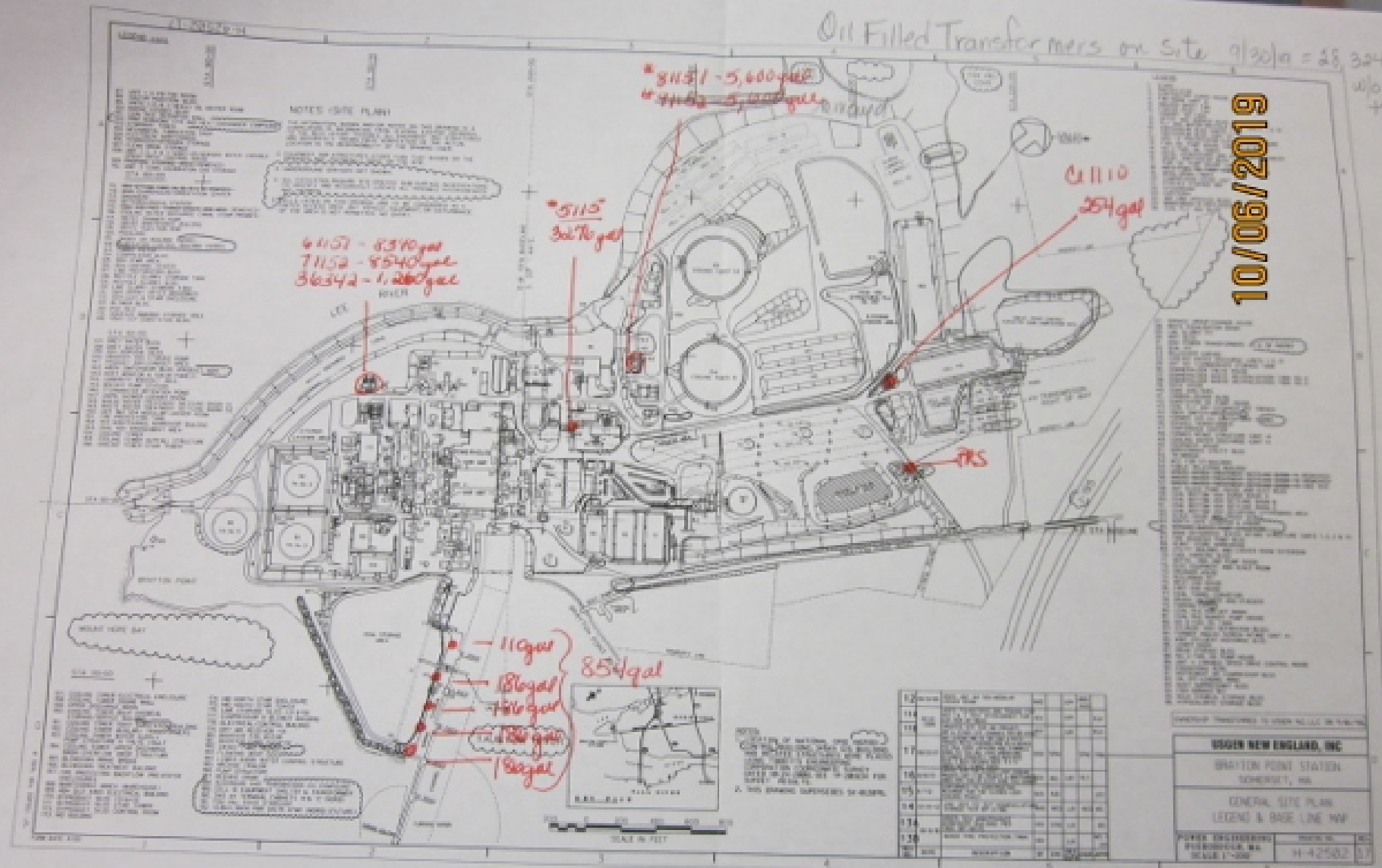
Photo Album

EPA CLEAN WATER ACT INSPECTION

Inspector: David Turin



Brayton Point LLC (Patriot Stevedoring and Logistics LLC)
 1 Brayton Point, SOMERSET MA
 EPA – CWA Inspection
 11/06/19



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PLAN REVIEW LOG

Date of Review ¹		PE Certification Required? ²	Reviewer's Signature ³	Reason for Amendment ⁴	Date of Amendment (or N/A)
Full	Partial	Yes / No			
	X			Change in Ownership from Dynegy to CDC of St. Louis 01/19/2018	
	X			All product in the USTs pumped out and tanks removed from the ground and closed out per State and Local Regulations. 09/27/2018	
	X			Majority of Main and Service Transformers drained of oil. 11/08/2018	

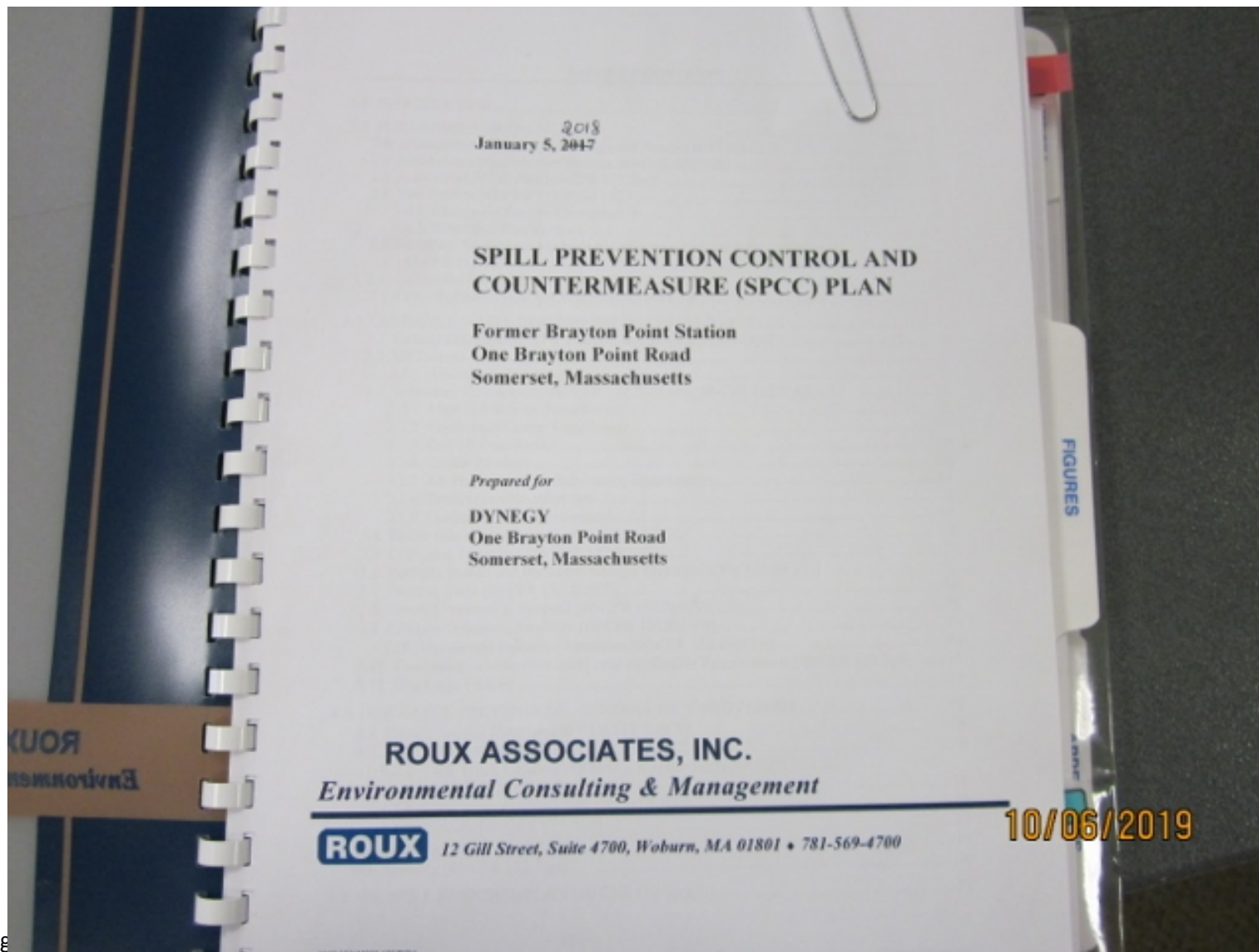
¹ A full review of the SPCC plan must be performed at least once every 5 years.

² The SPCC plan amendment must be certified by a P.E. when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge. Examples include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures.

³ Reviewer's signature indicates that he/she has completed review and evaluation for Brayton Point Power Station on the date indicated and will or will not amend the plan as a result, as indicated.

⁴ Briefly describe reasons for plan amendment. These may include one or more of the reasons in footnote 2, above, administrative changes such as updates to names or phone numbers, regulatory changes, or changes in company policies.

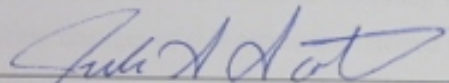
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2.2 Professional Engineer Certification [40 CFR 112.3(d)]

The undersigned Licensed Professional Engineer is familiar with the requirements of Chapter 40 of the Code of Federal Regulations Part 112 (40 CFR 112) and has supervised examination of this facility. The undersigned Licensed Professional Engineer attests that this Oil Spill Prevention, Control, and Countermeasure Plan has been prepared for Dynegy in accordance with good engineering practices including applicable industry standards and in accordance with the requirements of 40 CFR 112, that procedures have been established for required inspection procedures and testing, and that the plan is adequate for the facility.


Signature

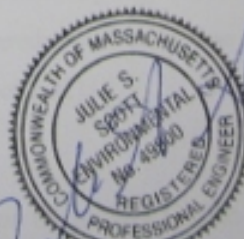
49900 MA
Professional Engineer Registration Number and Issuing State

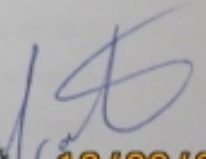
Julie Scott
Name

Principal Engineer
Title

Roux Associates, Inc.
Company

11/8/2018
Date




10/06/2019

FIGURES

Brayton Point Station

Title: SPCC Plan Monthly Oil Spill Prevention Inspections
Inspector: _____
Date: November 2018

INSTRUCTIONS: Inspect the equipment noted below and answer each question. Circle "Y" if a problem exists and fill out the comments section below, otherwise circle "N". Correct any problems immediately upon discovery.

Inspect for evidence of:

- Liquid product on the surface of oil-containing equipment or dripping lines or fittings.
- Liquid product on the surface of pipelines from the source to the end point.
- Liquid product dripping from drain lines, fittings, hoses, seepage from valves.
- Liquid product or fresh oil stains on the floor in the vicinity of oil-containing equipment and pipelines.
- Deterioration of equipment surfaces and supports, check foundation for cracks and gaps.
- Deterioration of earthen berms and geotextile membranes
- Water that needs to be drained from Containment areas.

If an oil leak or other problem is detected, immediately notify the Environmental Department and submit a defective equipment slip.

Interceptor	Visible oil on inlet side	Visible oil on discharge side	Absorbent boom in use	Valve Leaking
Interceptor 009	Y (N)	Y (N)	Y (N)	Y (N)
Interceptor 010	Y (N)	Y (N)	Y (N)	Y (N)
Interceptor 013	Y (N)	Y (N)	Y (N)	Y (N)
Interceptor 015	Y (N)	Y (N)	Y (N)	Y (N)

WWTS	Visible oil	Absorbent boom in use
5X9 Manhole	Y (N)	Y (N)
EQ Basin	Y (N)	Y (N)

Equipment	Transformer		Containment Area		
	Leaks	Deterioration	Leaks	Oil Present	Needs Draining
Precipitator Transformers					
Unit 1 New Precipitator (2nd Stage)	Y (N)	Y (N)	Y (N)	Y (N)	Y (N)
Unit 2 New Precipitator (2nd Stage)	Y (N)	Y (N)	Y (N)	Y (N)	Y (N)
Unit 3 Old Precipitator (1st Stage)	Y (N)	Y (N)	Y (N)	Y (N)	Y (N)
Unit 3 New Precipitator (2nd Stage)	Y (N)	Y (N)	Y (N)	Y (N)	Y (N)
Unit 4 Precipitator 4-1 Level	Y (N)	Y (N)	Y (N)	Y (N)	Y (N)
Unit 4 Precipitator 4-2 Level	Y (N)	Y (N)	Y (N)	Y (N)	Y (N)

precips being drained of oil by SES (Strategic Environmental Services) completed 11/8/18. all oil removed from precips



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